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9	Attorneys for Plaintiff		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13			
14	UNITED STATES OF AMERICA, ) No. CR 11-0625 EMC		
15	Plaintiff, STIPULATION AND [PROPOSED]		
16	) ORDER EXCLUDING TIME v. )		
17 18	BASSAM YACOUB SALMAN ) a/k/a Bassam Jacob Salman, )		
19	Defendant.		
20	)		
21	WHEREAS, on October 26, 2011, the United States produced approximately 937,000		
22	pages of documents and other materials to counsel for the defendant;		
23	WHEREAS, counsel for the defendant needs time to review the discovery;		
24	WHEREAS, the Court held a status conference on May 9, 2012, and set this case for trial		
25	on March 4, 2013;		
26	WHEREAS, in an order dated May 23, 2012, and with the consent of the defendant, the		
27	Court concluded that the exclusion of time from May 9, 2012, to March 4, 2013, should be made		
28	under 18 U.S.C. § 3161(h)(7)(B)(iv);		
	STIP. & [PROPOSED] ORDER EXCLUDING TIME CR 11-0625 EMC		

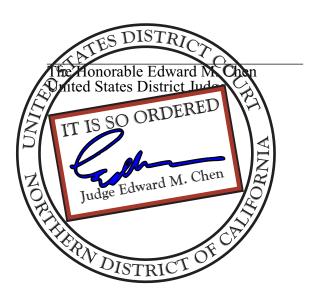
1	WHEREAS, on December 19, 2012, the Court reset the trial date to March 18, 2013, and		
2	set a pre-trial conference on February 26, 2013;		
3	WHEREAS, on January 8, 2013, the Court granted the defendant's motion to continue		
4	the trial and reset the trial date to June 24, 2013;		
5	WHEREAS, a failure to grant the continuance would deny defense counsel the reasonable		
6	time necessary for effective preparation, taking into account the exercise of due diligence, and		
7	under the circumstances, the ends of justice served by a reasonable continuance outweigh the		
8	best interest of the public and the defendant in a speedy trial;		
9	WHEREAS, the defendant consents to the exclusion of time from January 8, 2013, to		
10	June 24, 2013;		
11	THEREFORE, it is hereby stipulated by and between the parties, through their respective		
12	counsel of record, that the period of time from January 8, 2013, to June 24, 2013, shall be		
13	excluded in computing the time within which the trial of the offenses alleged in the Indictment		
14	must commence under 18 U.S.C. § 3161.		
15	5		
16	6 DATED: January 9, 2013 MEI	LINDA HAAG ted States Attorney	
17	7	led States Attorney	
18	8	/c/	
19		BERT S. LEACH AM A. REEVES	
20		istant United States Attorneys	
21	DATED: January 9, 2013	IL SHIFMAN, ESQ.  Offices of Gail Shifman	
22		Offices of Gail Sillillian	
23	3	/s/	
24	GAI	IL SHIFMAN, ESQ. unsel to Defendant Bassam Salman	
25		hiser to Detendant Bassam Sannan	
26	6 ///		
27	7 ///		
28	8 ///		
	STIP. & [PROPOSED] ORDER EXCLUDING TIME CR 11-0625 EMC		

## ORDER EXCLUDING TIME

Pursuant to stipulation, it is HEREBY ORDERED as follows:

The Court finds that the ends of justice served by granting a continuance from January 8, 2013, to June 24, 2013, outweigh the best interests of the public and the defendant in a speedy trial. The Court ORDERS that the time between January 8, 2013, to June 24, 2013, shall be excluded in computing the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) & (B)(iv).

DATED: January \_\_\_\_\_, 2013



STIP. & [PROPOSED] ORDER EXCLUDING TIME CR 11-0625 EMC